

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**Ryan Quarles,
Plaintiff.**

v.

**Philadelphia Police Officers
Matthew Ponente, Badge # 7384,
Rozman, Badge #7079,
Aaron Turner, Badge # 9439,
Tilghman, Badge 6338, and
Sgt. McCabe, Badge # 403
Defendants.**

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: Civil Action No.
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NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1332, 1441 and 1446, Defendants, Philadelphia Police Officers Matthew Ponente, Rozman, Aaron Turner, Tilghman and Philadelphia Police Sergeant McCabe, timely remove this action from the Court of Common Pleas of Philadelphia County, Pennsylvania, to the United States District Court for the Eastern District of Pennsylvania, on the following grounds:

1. On May 25, 2021, Ryan Quarles (“Plaintiff”) filed a Complaint in the Philadelphia Court of Common Pleas, which is captioned as *Quarles v. Ponente, Badge # 7384, et al.*, with the associated civil action number 210502280 in that court. A true and correct copy of that Complaint is attached here as Exhibit A.

2. By his Complaint, Plaintiff alleges that he “is a resident of Gwinnett County, Georgia.” Compl., Ex. A, ¶ 2.

3. By his Complaint, Plaintiff alleges that he is seeking “*substantial* compensatory and punitive damages . . . in the amount of **Ten Million Dollars (\$10,000,000).**” Ex. A, ¶ 50

(emphasis in original).

4. 28 U.S.C. § 1332 states that “[t]he district courts shall have original jurisdiction of all civil actions where the matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs, and is between: (1) citizens of different States.” 28 U.S.C. § 1332(a)(1).

5. The United States District Court for the Eastern District of Pennsylvania has jurisdiction over the claims alleged by Plaintiff, pursuant to 28 U.S.C. § 1332.

6. Defendants, Philadelphia Police Officers Matthew Ponente, Rozman, Aaron Turner, Tilghman and Philadelphia Police Sergeant McCabe, are represented by the undersigned counsel.

7. True and correct copies of this Notice of Removal with accompanying exhibits and separate Notice to State Court of Filing of Notice of Removal, a copy of which is attached hereto as Exhibit B, will be served upon counsel for Plaintiff and filed with the Prothonotary of the Court of Common Pleas of Philadelphia County, Pennsylvania, in accordance with the provisions of 28 U.S.C. § 1446(d).

8. In filing this Notice of Removal, Defendants do not waive any available defenses in this action.

WHEREFORE, Defendants, Philadelphia Police Officers Matthew Ponente, Rozman, Aaron Turner, Tilghman and Philadelphia Police Sergeant McCabe, request that the State Court Action, docketed at Docket No. 210502280 in the Court of Common Pleas of Philadelphia County, Pennsylvania, be removed from the Court of Common Pleas of Philadelphia County, Pennsylvania to the United States District Court for the Eastern District of Pennsylvania.

Date: June 24, 2021

Respectfully submitted,

/s/ Shannon Zabel

Shannon Zabel, Esquire
Deputy City Solicitor
Pa. Attorney ID No. 321222
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CERTIFICATE OF SERVICE

I, Shannon Zabel, Attorney for Defendants, Philadelphia Police Officers Matthew Ponente, Rozman, Aaron Turner, Tilghman and Philadelphia Police Sergeant McCabe, do hereby certify that a true and correct copy of the attached Notice of Removal has been served upon the following by email:

Aaron Bell, Esq.
Law Office of Aaron Bell
7303 Frankford Avenue, P.O. Box 22024
Philadelphia, PA 19136
aaronbelllawfirm@gmail.com

Date: June 24, 2021

Respectfully submitted,

/s/ Shannon Zabel
Shannon Zabel
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